

## **RFI for Transmission Siting and Economic Development Grants**

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In the summer of 2008, I became a transmission opponent when two of the largest utilities in the country proposed routing a new transmission line across the street from my house. Four rough years later that transmission project was cancelled before a shovel ever hit the ground, when regional transmission operator PJM Interconnection determined that it was no longer needed. Since 2008 I have communicated with, advised, and listened to hundreds of landowners across the nation who have formed opposition groups against dozens of proposed transmission projects. Never once have I heard an affected landowner say that they were ending their opposition because they had been “educated” by state officials, or because the transmission developer promised jobs, contributed to a local charity, or paid off local government officials.

While the wisdom of the lobbyist-created legislation that DOE is attempting to enact here is questionable, perhaps not all is lost. Just because Congress did not consult real people affected by new transmission rights-of-way when attempting to devise a way to expeditiously site and permit new transmission doesn't mean that DOE should skip this important step.

What do transmission opponents want? Proactive disengagement. They want the transmission line to be sited in such a way that they never have to engage in the first place. Transmission battles are hard on opponents. They are time-consuming, expensive, and exhausting. However there is no option to give up when their homes, heritage, health and sometimes even their livelihood are at stake. Transmission opponents would love nothing better than to ignore (or even support!) new transmission proposals that don't require a new right-of-way across their land.

How can that happen? New transmission can be sited on existing public rights-of-way and buried, similar to fiber optic cables. It is virtually unheard of for large, noisy opposition to develop to the laying of new fiber optic cable alongside roadways. Why not apply what works and proactively disengage with private landowners from the start?

### **a. Eligible Siting Activities with Respect to Covered Transmission Projects**

4. What methods and tools are available to assist siting authorities in examining alternative siting corridors for covered transmission projects? How could DOE grants expand access to these tools, and how would that improve the chances for successful siting request processing or shorten the time required to reach a decision?

Answer: Assisting siting authorities in paying for independent study of transmission routes buried on existing highway, road, rail, or buried underneath linear bodies of water would drastically shorten the time required to reach a decision because there would be little to no opposition to such a route.

In addition, citizens living on new transmission routes have historically suggested different routes, burial, or use of existing corridors combined with upgrading old lines. Transmission developers or regional planners initially reject these types of suggestions, even when they eventually end up being accepted and ordered by regulators after years of delay.<sup>1</sup> DOE could speed up the process by providing grant funding to study routing or configuration options suggested by intervenors.

5. What studies and analyses are required to identify alternative siting corridors?

Answer: An experienced engineering firm with knowledge of buried electric transmission on existing linear rights-of-way could prepare an alternative corridor siting study to compare to any aerial transmission line routes on new rights-of-way across private property proposed by the applicant. The same studies could be done for other project routing or configuration suggestions.

6. What impact would examining alternative siting corridors have on the time required for processing siting requests?

Answer: While performing a new siting study may take several months, if it eliminated opposition to the transmission project (and maybe even developed support for it), then it could cut months or years off the permitting timeline of a hotly contested transmission project.

10. What other measures and actions could be undertaken with grant funding to a siting authority that may improve the chances of, and shorten the time required for, the issuance of permits or other necessary approvals for a covered transmission project? What unique measures and actions would allow **communities** to support the timely review process by siting authorities of a covered transmission project? For any measure or action recommended, please explain how it would improve the chances of, and shorten the time required for, siting authority approval of a covered transmission project.

Answer: First the word “communities” must be defined. As used in the statute, “communities” is defined as “communities that may be affected by the construction and operation of a covered transmission project.”<sup>2</sup> Landowners along the project’s route who would have new transmission rights-of-way across their properties are the ones most affected by a transmission project. Adjoining landowners may also experience lesser impacts. Landowners who may see the line in the distance may also experience some very

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<sup>1</sup> See Tehachapi Transmission project in Chino Hills, CA that was torn down and buried at the direction of regulators shortly after being erected. See also Monmouth County Reliability Project in New Jersey, which was denied a permit when it was determined that upgrades to existing lines would solve the reliability issue. See also Independence Energy Connection in MD & PA, where opposition group suggestions to add new lines to existing towers instead of building new towers on new rights-of-way was eventually adopted. These are just three examples. Opposition routing suggestions have caused project revisions on many other projects.

<sup>2</sup> Inflation Reduction Act, Sec. 50152 (b)(2)

limited visual impacts. Citizens of a nearby town who do not see the transmission line, nor have it on their property, experience little to no impacts from the construction and operation of the project. Impacts diminish with distance from the centerline of the transmission project. Therefore, a “community” must be defined as directly affected landowners and those within a certain distance from the project’s centerline. Just because this community is linear and not defined by existing town, county, or state boundaries does not mean it is not a community affected by the construction and operation of a covered project.

When “communities” is properly understood to be directly affected landowners, the answer is that only moving the transmission line to an existing linear infrastructure right-of-way and burying it would allow communities to support timely review and permitting. Anything less would fuel continued opposition and delay in the regulatory process by directly affected landowners. Once-affected landowners, who are suddenly no longer impacted, won’t continue to pour their time and money into participating in the regulatory process to oppose the transmission project.

But if “communities” is defined as citizens living within a town, county, or state through which a covered transmission project passes, the majority of whom are not affected by the construction or operation of the project, the picture changes. Some individuals who are not affected by the project may support the timely review of the project in the regulatory process in exchange for personal gain. However, the affected community looks at these individuals as the traitors they are and backlash is often swift and vicious. No person who throws their neighbor under the bus in exchange for their own gain is ever a revered and respected member of their community. This kind of community bribery is unlikely to work in rural areas, where values are still more important than money. My experience has been that unaffected persons who declare support for a transmission project act like gasoline on a campfire, drawing the ire of even more community members and further expanding and entrenching opposition to the project. Of course, increased opposition only further delays project permitting.

11. How could grants to siting authorities be used to support the ability of individual communities and community members to participate in transmission siting processes? For example, what do individual communities and community members need to effectively participate and bring their perspectives and concerns regarding a covered transmission project early in those processes to avoid later delays in completing siting approvals or decisions? Are there access or education needs for communities and community members that are not being met that could be supported by grants to siting authorities?

Answer: In some states, siting authorities provide funding for groups that intervene in the regulatory process. However, the bulk of the funding has historically been awarded to existing organizations that support the transmission project. Affected landowners who may oppose the project get little to no financial support for their participation. Utilities who provide funding to regulatory agencies, and sometimes even the regulators themselves, do not want to support or encourage any party that opposes the project. If

grants are provided to siting authorities for intervenor participation, they must be limited to directly affected landowners.

The idea that affected landowners can be “educated” to accept or support a new transmission project across their property is hubris at its most galling. There is a trust deficit that looms much larger than any education deficit, and that makes government or industry “education” a non-starter. Any government that attempts to “educate” a landowner to happily give up his private property and live with outsized impacts will be met with staunch resistance. Just how stupid does their government think they are that they can be easily swayed to willingly harm themselves? Rural landowners are not sheep that are easily led, and any person or government who believes they are is deluded by their own hubris.

The notion that “early” participation by affected landowners results in faster siting and permitting is a myth that has no correlation to reality. It is not the timing of the participation, but its quality that determines whether opposition develops and continues. Communities are always approached with a fait accompli (a fully developed transmission project proposal) and their only choice is where in their community to put it. At first, community members may scramble to push it off their own land and on to their neighbors, but this initial panic is not sustainable. Group opposition soon develops that aims to stop the transmission project altogether so it’s not in anyone’s back yard. The only way “early” would matter would be if communities were consulted during the phase when the need for a project was being debated, long before possible routes are developed. Obviously, this is too early and can’t happen. Therefore, “early” doesn’t matter.

12. What stages of the review process need the most support through the grant funding and why?

Answer: When was it determined that a state or local review process “needs” grant funding? State review processes are supposed to be performed by impartial regulators acting in the best interests of the consumers and citizens. Offering state regulators money in exchange for approvals, or faster approvals, sounds suspiciously like a bribe. If a party to a state permitting process offered regulators money in exchange for approval, it would be an illegal bribe. Has our Congress now made bribing regulators sworn to protect the public interest legal?

#### **b. Economic Development Activities for Affected Communities**

14. What types of economic development activities for communities that may be affected by the construction and operation of a covered transmission project could be supported by a grant?

Answer: Understanding that the “community” affected by the construction and operation of a covered transmission project consists of directly affected landowners and adjacent properties, it is questionable whether an “economic development” grant would be needed or wanted, or even have a clear recipient. Linear infrastructure, such as transmission, does

not have a traditional “community”. Instead, its “community” is as linear as the proposed infrastructure.

Making payments to nearby traditional “communities” who will not have to live with the transmission project on their properties, and who will not have to give up anything at all in exchange for being financially rewarded, is an injustice that causes community strife, ends friendships, and changes elections. No landowner who looks out his kitchen window in the morning directly into a 40 x 40 ft. lattice tower base is comforted to know that a nearby town has provided tax breaks for a new Wal-Mart as a reward for his suffering. Only those actually impacted deserve to be rewarded with grants, which should reflect their degree of impact.

The grant money could be better used to study and support the routing of new transmission buried on existing road and rail rights-of-way, or underneath linear bodies of water that travel in the desired direction. Buried transmission on existing public rights-of-way does not cause economic impacts to affected communities. Instead, it brings economic reward to nearby communities during its construction period. All the reward without the impact!

15. What best practices exist for supporting economic development in communities affected by the construction and operation of electric transmission or other energy infrastructure? Additionally, what best practices exist specific to supporting economic development in disadvantaged, underserved, and frontline communities, or “energy communities” that have been or may be impacted by the construction and operation of a covered transmission project? Should DOE prioritize grant awards to proposals that would utilize these best practices? How should these grants be evaluated or scored, including relative to siting grants?

Answer: Since nearly all new, aboveground transmission is proposed for rural communities, “energy communities” as defined have no correlation to “affected communities”. Nobody is proposing to build new transmission to coal-fired power plants. Instead, existing transmission connecting to old generators that have closed will be removed or repurposed. There’s plenty of available transmission capacity near dirty generators that have been shuttered. In addition, overhead transmission is rarely proposed in dense neighborhoods because there is not enough land space for it. Transmission that may be needed in those neighborhoods would be routed underground on existing streets.

If DOE is suggesting that this \$760M be awarded to “energy communities” based on past impacts that seems to stretch the purpose and intent of the statute, which is to facilitate the siting and permitting of NEW transmission.

Are there existing “best practices” for bribing unaffected citizens in towns close to affected communities in exchange for their support of new proposals? Transmission developers have been engaging in astroturfing practices for decades whereby they fund “coalitions” to advocate for the project before state siting authorities. In exchange for quid pro quo promises and “corporate sponsorship” of local organizations, unaffected prominent citizens

and businesses from nearby communities may be only too happy to take money in exchange for reading a canned speech supporting the project at a public hearing. To see how this works, read about how Entergy used paid actors to show support for a new generator in New Orleans.<sup>3</sup> See also *Newman v. FERC*,<sup>4</sup> where the Court determined that public relations and advocacy activities to support the Potomac-Appalachian Transmission Highline were not the financial responsibility of electric ratepayers. The current “best practice” to buy community support is not actually “best” at all.

Finally, it is unclear what authority DOE has to include “other energy infrastructure” in its grant program facilitated by the statute.

16. What approaches (e.g., partnerships and business models) to providing economic development services should be prioritized for grants to siting authorities, or other State, local, or Tribal government entities for economic development activities for communities that may be affected by the construction and operation of a covered transmission project? Is there precedent or community interest in using the funding to support a community in investing in an equity stake in the transmission project to provide long-term, sustainable financial benefit from project construction?

Answer: It is highly questionable whether utilities or their regulators would allow communities to invest in highly regulated transmission projects that earn generous returns. Furthermore, affected landowners do not want to invest their money in new transmission across their land. They simply want to be left alone. If DOE is proposing to use grant funds provided by American taxpayers to set up affected community groups that are allowed to “invest” those other people’s money in new transmission for their own profit, it’s an experiment in enticing pure greed. Affected landowners have never been permitted to “share in the wealth” of new transmission that personally impacts them. They say that every man has his price, but landowners impacted by construction and operation of new transmission projects are never allowed to set their price due to public utility use of eminent domain to short-circuit any negotiations on price. Since it has never been tried before, it is uncertain if financial gain beyond one-time “fair market value” easement payments would entice landowners to support new transmission across their land.

If DOE is suggesting that groups of unaffected individuals in nearby towns (or even some far away) should be allowed to use taxpayer funds to invest in transmission for a personal profit, such action would only fuel opposition and further delay transmission development. It is also questionable whether the statute supports this action, since the communities that are supposed to draw benefit are those “communities that may be affected by the construction and operation of a covered transmission project.”

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<sup>3</sup> <https://thelensnola.org/2018/05/04/actors-were-paid-to-support-entergys-power-plant-at-new-orleans-city-council-meetings/>

<sup>4</sup> *Newman v. Federal Energy Regulatory Commission*, United States Court of Appeals, District of Columbia Circuit, 27 F.4th 690 (2021).

17. In what ways, if any, could efforts to mitigate ecosystem, natural resource, or environmental damage be considered eligible economic development activities under the program?

Answer: What if we could have new transmission without any ecosystem, natural resource or environmental damage at all? Burying new transmission on existing road and rail rights-of-way is technologically and economically feasible.<sup>5</sup>

18. In what ways, if any, could efforts by transmission project developers to reroute, underground, or increase line capacity to avoid repeat or future disruptions from project development, or otherwise implement project designs to limit impacts on communities and landowners be considered eligible economic development activities under the program?

Answer: If buried transmission on existing public use rights-of-way no longer impacts agricultural production or impedes rural land use, those communities would continue to thrive economically without injections of taxpayer dollars in the form of grants. If you don't cause a problem, you don't have to fix one.

Alternatively, landowners have reacted positively to repair/replacement of existing transmission with like infrastructure, even when it is on their land, if it is contained within the existing right-of-way. Expanding rights-of-way or adding additional parallel transmission rights-of-way is not acceptable.

### **c. Equity, Energy, and Environmental Justice**

19. What equity, energy, and environmental justice concerns or priorities are most relevant to the siting of interstate or offshore electricity transmission lines? How have/can these concerns or priorities been/be addressed?

Answer: Environmental justice communities for rural energy projects are remarkably different from those for urban energy projects, although both share outsized impacts to front line communities without the resources to participate in the decision-making or adequately defend themselves.

Interstate transmission for the purpose of moving renewables from the Midwest to both coasts primarily impacts rural farming communities. Farmland is often the first choice of transmission line routing experts because it is cleared, relatively level, and free of homes, buildings or other obstructions. Transmission builders often look at farmland as "vacant land" ready to be used. In fact, farmland is already devoted to its highest and best use: growing food to feed America! Transmission lines, or other linear infrastructure projects, are obstructions to production and because transmission line routers also like to site new transmission parallel to existing lines, the farmland is slowly chopped up until it becomes uneconomic, or simply impossible, to farm. Farms and farmers are hit again and again with

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<sup>5</sup> <https://theray.org/2022/04/12/the-ray-and-ngi-release-their-nextgen-highways-feasibility-study-for-the-minnesota-department-of-transportation/>

linear energy projects. It would be unacceptable to continue to site new energy infrastructure in the same urban communities over and over and therefore farms already crossed by energy projects should be considered an environmental justice community to be avoided.

Farmers are an aging population with a very high percentage of senior citizens. Senior citizens may be challenged by lack of resources and information and may lack reliable Internet connections to get information and participate in decision-making. Public meetings that are held in the evenings and/or require long distance travel may also challenge Seniors. Seniors may also require help to navigate legal matters and may be unfairly targeted by unscrupulous transmission land agents pushing them to sign legal agreements without the help of an attorney.

A different environmental justice community impacted by rural transmission lines may be religious communities, such as Amish, Anabaptist, Brethren, Quaker, Mennonite, and others. Members of these groups are primarily engaged in agriculture and may be targeted by transmission builders because they rarely get involved in opposition to new transmission lines across their properties because of their religious beliefs.

What percentage of each of these groups (farmers, seniors, religious communities) is targeted by new rural transmission, and how do those percentages compare to the average national population? If the percentage of these communities impacted by transmission is higher than the percentage of these communities in the general population, then they must be considered environmental justice communities.

Routing of new transmission underground on existing public use rights-of-way avoids impacts to any environmental justice communities aside from limited temporary construction impacts.

20. What strategies, policies, and practices can siting authorities deploy to ensure that the goals of Justice40 are achieved? How should these be measured and evaluated?

Answer: Justice40 has no place in existing regulatory practice. Transmission is a beneficiary pays endeavor that uses eminent domain to condemn land for public use. Turning transmission into a mission to right past wrongs, or to make non-beneficiaries pay, is not just and reasonable.

It must be noted that transmission lines, by themselves, do not reduce greenhouse gases. Electrons are source neutral. It is impossible to separate the green ones from the brown ones. Furthermore, a transmission line is nothing more than a big extension cord. It must be plugged in to serve a purpose. If a new transmission line plugs into “green” electrons and delivers them to another place where they replace the generation of “brown” ones, then it could be said that transmission has helped lower greenhouse gases. But those green and brown electrons must be real and identifiable, not just hypothesized. Transmission lines cannot be designated as “clean energy” projects.



21. What approaches (e.g., partnerships, business models, or ownership models) would secure economic development opportunities in disadvantaged, underserved, and frontline communities, or “energy communities”?

Answer: The statute does not mention “energy communities”. Instead it mentions “communities that may be affected by the construction and operation of a covered transmission project.” Equating and combining energy communities with affected communities is a presumption that has no basis in reality. In some instances, overlaying Justice 40 on top of statutes just doesn’t work. This is one of them.

23. How can applicants ensure community-based stakeholders/organizations (especially in underserved communities) are engaged and included in the planning, decision-making, and implementation processes (e.g., including community-based organizations on the project team)?

Answer: When transmission is proposed for an underserved community, that community must be engaged and included in the planning and decision-making, just like it should be in any community. However, the vast majority of new transmission is proposed for communities that are not underserved. It would serve no purpose for underserved communities to be engaged in the planning and decision-making for new transmission that does not impact them.

My fifteen years engaged with utilities on transmission projects informs my opinion that no utility would ever let a community-based organization be an influential member of its “project team.” Investor-owned utilities and merchant transmission developers, who are the entities behind all new interstate transmission, are for-profit endeavors. A utility would never let outsiders direct its investments, nor should it. Of course, nothing would stop a utility from creating a fake “project team” and allowing community-based organizations to meet and perform busy-work tasks while being subliminally led to the utility’s desired conclusion. Don’t delude yourself that this could ever work to benefit the community.

25. How can transmission planning best support communities with goals to increase the resilience of power delivery to those communities and/or transition from fossil fuels?

Answer: This statute has nothing to do with transmission planning or community goals for energy use. It is for the purpose of facilitating the siting and permitting of new transmission by financially rewarding communities affected by the construction and operation of the project.

Long-distance transmission does not always benefits communities it impacts, and high-voltage direct current simply cannot benefit the communities it impacts because it must have hugely expensive AC/DC converter stations in order to connect to the communities it crosses. The problem of “fly-over” states, which get all the impact without any benefits, has been a huge impediment to interregional transmission actually getting built. One way to solve this problem is to mitigate the impacts by burying the transmission on existing public

use rights-of-way across the state, such as interstate highways. Not getting any benefit may be acceptable if there are no lasting impacts to be shouldered by the fly-over state.

## **Conclusion**

It is mind-boggling to know that our elected officials earmarked a stunning \$760 million taxpayer dollars for a program that is based on unsupported conjecture. If the goal of this program is to facilitate the siting and permitting of new electric transmission projects, where are the studies that show how this program can and should work? There are no studies because there has been no consultation with siting authorities or affected communities. This legislation was obviously developed by someone with no idea how state regulation of transmission permitting works; and without any knowledge of who opposes transmission projects and why. Rather than holding a secret Request for Information that is not transparent, DOE would be much more successful holding publicly accessible consultation periods with siting authorities and affected communities to find out what (if anything) would actually make a difference. Instead, DOE seems poised to begin a grant program to give away \$760M to bribe state regulators and reward unaffected communities. While this would be a colossal waste of taxpayer funds in any case, the real tragedy is that absolutely nothing will be accomplished.

The term “economic development” is not defined in the statute or within this program. A common definition would be “the process by which the economic well-being of a local community is improved according to targeted goals and objectives.” Affected linear communities along the centerline of a transmission project are economically harmed in various ways. New transmission across agricultural businesses lowers yields, interferes with production and, at the end of the day, lowers the affected farmer’s income and causes him to work harder and spend more money to produce a smaller crop on the remainder of the parcel. New transmission forecloses possible future land uses for the parcel it crosses. A farmer’s wealth is in his land. He doesn’t have an employer matched 401(K) waiting for him at the end of his career. He has his land, which can be rented or sold to provide retirement income. But new transmission spoils those careful plans and takes away planned retirement income. New transmission lowers property values. Whether admitted or not, the presence of a high-voltage transmission line on a parcel lowers its resale value. While the industry has produced volumes of study saying the opposite, the value of a parcel is dependent upon the public’s perception of it as a safe and peaceful home. Transmission lines are perceived as invasive, ugly, and dangerous obstructions. These are just some of the uncompensated economic impacts upon directly affected landowners whose economic well being is being diminished by the transmission line. What are DOE’s goals and objectives to reverse this and improve the affected landowner’s economic well being? Will DOE be giving its \$760M directly to affected landowners in the form of impact payments? It doesn’t sound like it. Perhaps the best DOE could do is to spend its \$760M studying the burial of electric transmission on existing road and rail rights-of-way and assisting transmission developers with bringing this new siting technique into mainstream use. If new transmission does not condemn and take new easements across private property, then

it does not diminish the economic well being of those landowners. Perhaps “do no harm” should be a basic objective.

DOE also has a lot of work ahead to consult with state siting authorities to determine what jurisdiction they have to “develop the economy” with a grant from DOE.<sup>6</sup> The handling of grant money for affected communities would most likely require new state legislation, and it is extremely doubtful that all states will change the purpose and jurisdiction of state siting bodies for this program. While state, local, or Tribal governments may have the legal ability to accept grant money on behalf of their communities, there is no guarantee that the grant money would actually benefit the linear communities created along the center line of a transmission project that are the communities affected by the construction and operation of a covered transmission project. If affected communities draw no benefit from the grants, does it meet the statutory objectives? How are the grants supposed to change anything that could lead to easier transmission siting and permitting? This program simply cannot work as envisioned in the statute.

“Community benefits” shouldn’t be just a tool for DOE to gain unaffected community and governmental support to shepherd through a project without actually engaging with affected community members and offering tangible and measurable benefits. What good are community benefit grants that don’t receive any follow-up to ensure that they have met project objectives and weren’t just wasted on unrelated expenditures? If this program is ever to be successful, it must have measurable deliverables to show how the economic well being of an affected landowner was improved, or how the grant money facilitated faster permitting, or how the grant money caused energy justice for communities affected by the construction and operation of the transmission project. If DOE believes “potential benefits from federal investment in the siting of interstate electricity transmission lines include grid resilience, reduced energy prices, equitable access to clean energy, and job opportunities” then it should have no trouble quantifying and proving these metrics with facts and statistics. However, I suspect this claim is nothing but colorful words that mean absolutely nothing... except the waste of \$760M of taxpayer funds.

The federal government’s involvement in any problem has never succeeded in making it easier or faster. The federal government barely lumbers along under its own weight and its involvement in state jurisdictional siting and permitting is only going to slow things down. Of course, none of that will matter to landowner communities along new rights-of-way for proposed “covered transmission projects.” Slowing down state siting processes with new studies and simultaneous participation in other regulatory jurisdictions works in transmission opposition’s favor.

At the end of the day, economic development bribes for unaffected “communities” and bribes to state regulators to approve a transmission project faster will do absolutely nothing to solve the opposition of directly affected landowners that delays and cancels new

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<sup>6</sup> Under Section 50152(b)(2), the Secretary may also make a grant to a siting authority, or other State, local, or Tribal governmental entity, for economic development activities for communities that may be affected by the construction and operation of a covered transmission project.

transmission projects that impact their private property. There is a fundamental mismatch between impact (private landowners) and reward (community as a whole). A landowner whose property is condemned to make way for a covered transmission project must receive just compensation under the law. He does not share his compensation with neighbors, the county treasury, or the hardware store owner on the other side of town. It is his alone because he is the one who has had something taken that requires compensation. Paying economic development compensation to persons who have not had anything taken from them for the purpose of buying their support and advocacy for a transmission project that affects someone else is nothing more than a bribe in its purest form. Bribe: persuade (someone) to act in one's favor by a gift of money or other inducement. Those who are actually affected by a covered transmission project will not stop opposing and delaying that project because the federal government bought fake support from unaffected groups or individuals. Purchased fake support does not fool regulators. It doesn't fool anyone in the community, either. It will only fool the fools in D.C. who purchase it. This program can only work if reward is matched with impact and, in fact, the statute commands it.<sup>7</sup>

The effects of a transmission project must be listed and detailed and matched with grant fund rewards. Affected communities must be consulted on impacts and rewards. Rewarding a city, town, or county for transmission impacts only works if transmission is sited on city or town public property owned by everyone, in which case everyone should rightly be rewarded for the use of their land. Federal money spread around an unaffected community doesn't reduce the conflicts that stall the siting process. Paying unaffected community members to support a project that impacts others actually increases local conflicts and causes additional delays. If DOE wants to know what might actually work to quell opposition, perhaps it should ask a transmission opponent before wasting \$760M on a program that doesn't work, or worse yet compounds the problem?

“The nine most terrifying words in the English language are ‘I’m from the government and I’m here to help.’” – Ronald Reagan

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<sup>7</sup> “...communities that may be affected by the construction and operation of a covered transmission project.”